

EXHIBIT H

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF PATRICIA A. FARRAR

I, Patricia A. Farrar, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached herein as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center Towers occurred. At the time of these horrific attacks, I worked for Kelly Services, Inc., a temp agency. I had been assigned to Dunn & Bradstreet's World Trade Center offices as a collections clerk at the time of the events of 9/11.

4. When the first passenger jet, American Airlines Flight 11, struck the upper section of the North Tower, I had been sitting at my desk located on the Fourteenth Floor of the North Tower. Following the blast, our supervisor told us to evacuate the building. I decided to evacuate from Dunn & Bradstreet's offices in the North Tower by heading down the nearest stairwell.

5. As I entered the stairwell, I encountered a sea of people fleeing down the steps. The scene was chaotic, and myself and others were trampled as we went down the steps to the ground floor. I fell down the steps on several occasions, and I received numerous cuts and bruises. I actually began to bleed from my nose and ears due to my numerous falls while trying to escape down the steps to exit the North Tower.

6. When I exited the North Tower onto the street level, I saw the second passenger jet, United Airlines Flight 175, strike the upper section of the South Tower. Following this incredible explosion, I saw people jumping from windows and those who were engulfed in flames. I also saw many people who were struck by falling building debris and who were trampled while trying to run away from the area. The scene looked like a war zone and it will live in my memory forever.

7. As the South Tower then began to collapse, I ran to escape the area. As I became engulfed in a huge cloud of smoke, dust, and building debris, I inhaled large quantities of these toxins into my lungs and airways. A woman pulled me into a building to escape the dust and falling debris. The woman gave me a towel to put over my face. I became short of breath and my chest began to hurt.

8. After the chaos had subsided, I exited the safety of the building and I walked to Penn Station. I took the train to New Jersey, and I immediately went to Jersey Shore Medical Center to receive treatment for my inhalation injuries, my chest pain, my back pain, and my cuts and contusions.

9. As a result of these terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: bronchitis¹; respiratory airway disorder²; allergic rhinitis³;

¹ See, Medical Records of Patricia A. Farrar (FARRAR_MEDS_0001) attached hereto as Exhibit B at 0005 and 0038.

² *Id.* at 0002, 0019 and 0035.

³ *Id.* at 0024, 0036 and 0038.

asthma⁴; chronic sinusitis⁵; a chronic sore throat⁶; back pain⁷; bleeding from my nose and ears⁸; multiple contusions⁹; gastroesophageal reflux disease (GERD)¹⁰; and sleep disturbances¹¹.

10. I further suffered, and continue to suffer, severe emotional distress as a result of these terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to these traumatic events almost daily, triggered by certain smells, sounds and views. I have been diagnosed with a major depressive disorder with recurrence, post-traumatic stress disorder, anxiety disorder, panic attacks and depression¹². The horrific events that I witnessed on 9/11 directly caused all of the above conditions, which continue to this day.

11. I sought and continue to seek medical attention on a monthly basis for my injuries caused by these terrorist attacks. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 20th day of October 2021.



Declarant Patricia A. Farrar

⁴ *Id.* at 0011 and 0016.

⁵ *Id.* at 0024, 0027 and 0033.

⁶ *Id.* at 0012 and 0026.

⁷ *Id.* at 0004, 0025, 0033, 0035 and 0037.

⁸ *Id.* at 0004.

⁹ *Id.* at 0003, 0005, 0010 and 0012.

¹⁰ *Id.* at 0020 and 0036.

¹¹ *Id.* at 0012, 0025,

¹² *Id.* at 0013, 0015-0016, 0024-0025, 0027, 0033 and 0036.

**EXHIBITS
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